

STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY **DEPARTMENT OF SOCIAL SERVICES**

744 P Street • Sacramento, CA 95814 • www.cdss.ca.gov



October 18, 2018

Barry L. Zimmerman, Director Ventura County Human Services Agency 855 Partridge Drive Ventura, CA 93003

Dear Mr. Zimmerman:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided to the reviewer from our office during the course of the Civil Rights Compliance Review of June 25, 2018 to June 29, 2018. Enclosed is the final report on the review.

There are some compliance issues (deficiencies) identified in the report, which will require the development of a Corrective Action Plan (CAP). Please submit your CAP within 60 days of this letter. Please address each deficiency and include steps and time lines for the completion of all corrective actions and recommendations listed in the enclosed report.

Please submit your CAP in both hardcopy and, in an effort to comply with the Americans with Disabilities Act website accessibility, we also require the CAP to be submitted electronically as a Word document via crb@dss.ca.gov.

We will provide a copy of your report to any individual who makes a valid Public Records Act (PRA) request. Our reports are considered public documents under the PRA. Once we approve your CAP, it becomes a public document as well. In addition, these documents are published at http://www.cdss.ca.gov/inforesources/Civil-Rights/Compliance-Reports-and-Corrective-Action-Plans

If you need technical assistance in the development of your CAP, please feel free to contact James Urquizo at (916) 607-5916. You may also contact us at crb@dss.ca.gov.

Sincerely,

Original signed by Christina Teixeira

CHRISTINA TEIXEIRA, Manager Civil Rights Unit Housing, Homelessness, and Civil Rights Branch

Enclosure

c: Don Aquirre, Civil Rights Coordinator

Kim McCoy Wade, Chief CalFresh Branch

Tami Gutierrez, Chief CalFresh Operations Bureau

Alexis Fernandez, Chief CalFresh Policy Bureau

Francisco Verduzco, Chief CalFresh Technical Assistance and Evaluation Section

Jacqueline Hom County Operations Manager

Joe Torres, Office of Civil Rights USDA Food and Nutrition Services Supplemental Nutrition Assistance Program (SNAP) Western Region

Maribelle Balbes, Chief USDA Food and Nutrition Services Supplemental Nutrition Assistance Program (SNAP) Western Region

Kevin Aslanian Coalition of California Welfare Rights Organizations, Inc.

Antoinette Dozier Western Center on Law and Poverty

FOR The County of Ventura Human Services Agency Conducted on June 25, 2018 to June 29, 2018

California Department of Social Services

Housing, Homelessness, and Civil Rights Branch

Civil Rights Unit

744 P Street, M.S. 8-16-70

Sacramento, CA 95814

Reviewer: Jaime Urquizo

(916) 654-2107

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I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Unit (CRU) staff was to assess the County of Ventura Human Services Agency with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

An on-site compliance review was conducted on May 21, 2018 through May 25, 2018. An exit interview was held on May 25, 2018, to review the preliminary findings.

The review was conducted in the following locations:

Name of Facility	Address	Programs	Non-English languages spoken by a substantial number of clients (5% or more)
Santa Clara Valley Community Services Center	725 E. Main, Santa Paula, CA	CalWORKS, Calfresh	Spanish
East County	2900 North Madera Road, Simi Valley, CA	CalWORKS, Calfresh, IHSS	Spanish
Ventura Children and Family Services Center	4651 Telephone Road, Ventura, CA	CalWORKS, Calfresh, Children Family Services	Spanish
HSA Administrative Services Center	855 Partridge Dr. Ventura, CA	Program Administration	None

II. SUMMARY OF METHODOLOGY

In preparing for this review, CDSS staff completed the following tasks:

- Reviewed the 2018-2019 Civil Rights Compliance Plan submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.
- Reviewed the previous Compliance Reviews and Corrective Action Plans submitted by the County.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Survey of civil rights coordinator
- Survey of program managers
- Case file reviews
- Facility inspections
- Discussion with community advocate groups. In this review the following organization(s) were contacted for feedback:

Arrow Child and Family Ministries 4001 Mission Oaks Blvd Camarillo, CA 93012 (281) 210-1500

Casa Pacifica 1722 South Lewis Road Camarillo, CA 93012 (805) 388-7740

Each site/program was reviewed for compliance in the following areas:

- Dissemination of Information
- · Facility Accessibility for Individuals with Disabilities
- Program Accessibility for Clients with Disabilities (physical, mental, learning, visual or hearing impairment, etc.)
- Bilingual Staffing/Services for Non-English-Speaking Clients
- Documentation of Client Case Records
- Staff Development and Training
- Discrimination Complaint Procedures

Here is a summary of the sources of information used for the review:

Interviews Conducted of Public Contact Staff

Classifications	Total	Bilingual
Eligibility Workers	20	14
Children Social Workers	6	4
Receptionist/Screeners	5	3
Total	31	21

Civil Rights Coordinator and Program Manager Surveys

Number of surveys distributed: (5)

Number of surveys received: (5)

Reviewed Case Files

English speakers' case files reviewed: (6)
Non-English or limited-English speakers' case files reviewed: (84)

Languages of clients' cases: (English / Spanish)
Reasonable Accommodation cases reviewed: (4)

Sections III through IX of this report contain specific Division 21 civil rights requirements and present field review findings regarding the County's compliance with each requirement. The report format first summarizes each requirement, then the actual review team findings, including appropriate comparisons. This format is an effort to validate the application of policies and procedures contained in the annual plan. Required corrective actions are stated at the end of each section.

Section X evaluates the County's Call/Service Centers services provided to non-English speaking clients and clients with a disability.

Section XI reviews the County's compliance plan, and provides either approval of the plan as submitted, or lays out additional information to be submitted to gain approval.

Section XII highlights issues pointed out by Community Input and summarizes Reviewer Observations.

Section XIII of the report is reserved for a declaration of overall compliance.

III. DISSEMINATION OF INFORMATION

Counties are required to disseminate information about program or program changes and about how applicants and recipients are protected by the CDSS regulations (Division 21). This dissemination should occur through outreach and information to all applicants, recipients, community organizations, and other interested persons, including non- and limited-English speakers and those with impaired hearing or vision or other disabling conditions.

A. Findings: Access to Services, Information and Outreach

Question (Please answer yes/no and provide response with comments.)	Comments
Does the County accommodate clients by flexing/extending their hours or allowing applications to be mailed in?	Yes, clients are able to mail in documents necessary to complete services application(s).
Can clients, including those with disabilities, access services when they are unable to go to the office?	Yes, online services are available for clients to use afterhours and when they are unable to go to the office.
Does the County ensure the awareness of available services individuals in remote areas?	Yes, the County has informational outreach programs to reach clients in remote areas.

B. Findings: Signage, Posters and Pamphlets

Question (Please answer yes/no and provide response with comments.)	Comments
Does the County use the CDSS pamphlet "Your Rights under California Welfare Programs" (Publication 13 – August 2016)?	Yes, Publication 13's are available to all clients.
Is the pamphlet distributed and explained to each client at intake and re-certification?	Yes, at intake all clients are briefed using the Publication 13 and handed the brochure. The Pub 13 is also mailed to those clients that can't pick up the pub 13 at the office.
Is the current version of Publication 13 available in Arabic, Armenian Cambodian, Chinese, English, Farsi, Hmong, Japanese, Korean, Lao Mien, Portuguese, Punjabi, Russian, Spanish, Tagalog, Ukrainian, and Vietnamese?	Yes, receptionists are aware of where to obtain Publication 13's in other languages at the CDSS website.

Question (Please answer yes/no and provide response with comments.)	Comments
Were the current versions of the required posters present in the lobbies?	Yes, current versions of the required posters were available and visibly posted, including:
	And Justice for All (# 475B) Everyone is Different, but Equal under the Law (PUB 86) Revised 03/07, with current CRC contact information
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non- English-speaking clients translated into appropriate languages?	Yes, instructional and directional signs are well posted in lobby areas for clients to utilize.

C. Corrective Actions: None.

D. Recommendations: None.

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

The Americans with Disabilities Act (ADA) requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from the services available. The federal regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable; in other words, easily accomplished and able to be carried out without much difficulty or expense.

The facility review is based on four priorities supported by the ADA regulations for planning achievable barrier removal projects. The priorities include ensuring accessible approach and entrance to the facility, access to goods and services, access to restrooms, and any other measures necessary.

Note that the references to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) in the Corrective Action column refer to the federal Standards for Design. Title 24 of California Code and Regulations (T24 CCR) is also cited because there are instances when California state law is stricter than ADAAG specifications.

The County must ensure that programs and activities are readily accessible to individuals with disabilities. This includes building accessibility and availability of accessible parking as well as accessibility of public telephones and restrooms.

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

A. Findings and Corrective Actions

1. Facility Location: (855 Partridge Drive, Ventura, CA)

Facility Element/Finding	Corrective Action
Disabled Parking Is there additional signage or additional language below the symbol of accessibility "Minimum Fine \$250"?	Additional language or an additional sign below the International Symbol of Accessibility (ISA) shall state Minimum Fine \$250. (CA T24 11B-502.6.2), California Accessibility Reference Manual (CARM), page 158
Three Disabled Parking signs did not have the additional language sign below stating: "Minimum Fine \$250".	

- a. Corrective Actions: Refer to Corrective Action column above (Section A, 1).
- **b.** Recommendations: Address and submit a Corrective Action Plan and correct all items identified in the Corrective Action column above (Section A, 1).
- 2. Facility Location: (2900 North Madera Road, Simi Valley, CA)

Facility Element/Finding	Corrective Action
Disabled Parking	An additional sign shall be posted either in a
Is there unauthorized	conspicuous place at each entrance to an off-street
parking signage at	parking facility OR immediately adjacent to on-site
entrance to off-street	accessible parking and visible from each parking space.
accessible parking?	
	(CA T24 11B-502.8) CARM page 159
Sign at entry of parking lot	
missing.	The additional sign shall not be less than 17 inches wide by 22 inches high.

Facility Element/Finding	Corrective Action
Continued from previous page	Continued from previous page
	(CA T24 11B502.8.1), CARM, Figure 4, page 159
	The additional sign shall clearly state in letters with a minimum height of 1 inch the following: Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or special license plates issued for persons with disabilities will be towed away at the owner's expense. Towed vehicles may be reclaimed at: or by telephoning
	(CA T24 11B-502.8.2), CARM page 159
	Blank spaces shall be filled in with appropriate information as a permanent part of the sign.
	(CA T24 11B-502.8.2), CARM page 159
Elevator Marked accessible? No disabled sign at entry to	Where existing elevators do not comply with this section, elevators complying with this section shall be clearly identified with the ISA complying with Section 57 "Signs & Identification".
elevator 1st and 2nd floor	(CA T24 11B-216.7), (ADA 216.7), CARM page 249
Disabled Parking Directional signage to accessible entrance if not main entrance? Height of signage?	Directional signs complying with Visual Characters heading in Section 63 (11B-703.5), "Signs & Identification" including the ISA complying with ISA heading in Section 63 (11B-703.7.2.1), "Signs & Identification", indicating the accessible route to the nearest accessible entrance shall be provided at junctions when the accessible route diverges from the regular circulation path.
	(CA T24 11B-216.6), CARM page 35
	Visual characters shall be 40 inches minimum above the finish floor or ground.
	(CA T24 11B-703.5.6), (ADA 703.5.6), CARM page 449

Facility Element/Finding	Corrective Action
Continued from previous	Continued from previous page
page	Recommend posting two directional signs coming up the driveway leading clients to the front of the building.
Disabled Parking Signage on pavement clearly depicts a	The parking space shall be marked with an ISA in white on a blue background - a minimum 36 inches wide by 36 inches high.
wheelchair with occupant?	(CA T24 11B-502.6.4.1), CARM page 159
Front of building disabled parking lines need to be repainted	OR
	In white or a suitable contrasting color.
"No Parking" painted on pavement in access aisles (letters minimum 12 inches	(CA T24 11B-502.6.4.2), CARM page 159
high)? Loading and unloading access aisle?	The centerline of the ISA shall be a maximum of 6 inches from the centerline of the parking space, its sides parallel to the length of the parking space and its lower corner at, or lower side aligned with, the end of the parking space length.
	(CA T24 11B-502.6.4.2), CARM page 159
	The words NO PARKING shall be painted on the surface each access aisle.
	(CA T24 11B-502.3.3), CARM page 166
	This notice shall be painted in white letters a minimum of 12 inches in height and located to be visible from the adjacent vehicular way.
	(CA 11B-502.3.3), CARM page 16
	Access aisles shall be marked with a blue painted borderline around their perimeter.
	(CA T24 11B-502.3.3), (ADA 502.3.3), CARM page 164

Facility Element/Finding	Corrective Action
Continued from previous	Continued from previous page
page	The area within the blue borderlines shall be marked with hatched lines a maximum of 36 inches on center in a color contrasting with that of the aisle surface, preferably blue or white.
	(CA T24 11B-502.3.3), CARM page 164
Main or Alternate Entrance Front entry into the building automatic doors tower is not	Operable parts shall be operable with one hand and shall not require tight grasping, pinching or twisting of the wrist.
structurally solid.	(CA T24 11B-309.4), (ADA 309.4), CARM page 221
	The force required to activate operable parts shall be five pounds.
	(CA T24 11B-309.4), (ADA 309.4), CARM page 221
	Operable parts of such hardware shall be thirty-four inches minimum and forty-four inches maximum above the finish floor or ground.
	(CA T24 11B-404.2.7), (ADA 404.2.7), CARM page 221
	Door closers and gate closers shall be adjusted so that from an open position of ninety degrees, the time required to move the door to a position of twelve inches from the latch is five seconds minimum.
	(CA T24 11B-404.2.8.1), (ADA 404.2.8.1), CARM page 222
Client Interview Rooms & Booths	Installation height above finished floor shall be 40 inches maximum. Please see Table 57-5.
If there is signage, is the signage compliant?	(CA T24 11B-703.5), (ADA 703.5), CARM page 45
Signage to be 40 inches maximum.	All instructional and directional signs posted in waiting areas and other places frequented by a substantial

Facility Element/Finding	Corrective Action
Continued from previous page	Continued from previous page
Available in threshold languages?	number of non-English-speaking applicants/recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that
Resource room signs are not in threshold language.	applicants/recipients may request aid or services in their primary language.
	(Div. 21-107.212)
Client Interview Rooms & Booths Turnaround in room (five foot turnaround, thirty six inches wide pathway, floor,	Where the accessible route makes a 180 degree turn around an element which is less than 48 inches wide, clear width shall be 42 inches minimum approaching the turn, 48 inches minimum at the turn and 42 inches minimum leaving the turn.
clear entrance for person with cane?	(CA T24 11B-403.5.2), (ADA 403.5.2), CARM page 212
Calfresh / Calworks Lobby: No Disabled interview rooms available with 5 inches	The turning space shall be a space of 60 inches diameter minimum.
turnabout space. Rooms 7 and 9 are the largest of the 13 rooms available.	(CA T24 11B-304.3.1), (ADA 304.3.1), CARM page 306
	The turning space shall be a T-shaped space within a 60 inches by 60 inches minimum square with arms and base 36 inches wide minimum.
	(CA T24 11B304.3.2), CARM page 306
Client Interview Rooms & Booths	Where the accessible route makes a 180° turn around an element which is less than 48 inches wide, clear width shall be 42 inches minimum approaching the turn,
Turnaround in room (five foot turnaround, thirty six inches wide pathway, floor,	48 inches minimum at the turn and 42 inches minimum leaving the turn.
clear entrance for person with cane?	(CA T24 11B-403.5.2), (ADA 403.5.2), CARM page 212
IHSS Lobby: Interview rooms 1 and 2 Civil Rights Compliance Review	The turning space shall be a space of 60 inches diameter minimum.

Facility Element/Finding	Corrective Action
Continued from previous page	Continued from previous page
(2 rooms total) do not have a 5 inches turnabout space.	(CA T24 11B-304.3.1), (ADA 304.3.1), CARM page 306 The turning space shall be a T-shaped space within sixty inches by sixty inches minimum square with arms and base thirty-six inches wide minimum.
Seating at table or desk	(CA T24 11B304.3.2), CARM page 306
(minimum 27 inches high knee clearance, minimum 30 inches wide.	Where knee clearance is required under an element as part of a clear floor space, the knee clearance shall be 11 inches minimum deep at 9 inches above the finish floor or ground and 8 inches minimum deep at 27 inches
Table depth is at 6 inches deep.	above the finish floor or ground.
	(CA T24 11B-306.3.3), (ADA 306.3.3), CARM page 305
	Knee clearance shall be 30 inches minimum wide.
	(CA T24 11B-306.3.5), (ADA 306.3.5), CARM page 305
Women's Restroom Pipes under sink securely insulated?	Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact.
Lavatory Pipe insulation	(CA T24 11B-606.5), (ADA 606.5), CARM page 372
needs to be rewrapped.	There shall be no sharp or abrasive surfaces under lavatories and sinks.
	(CA T24 11B-606.5), (ADA 606.5), CARM page 37
Directional & Informational Signage Available in threshold languages?	All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants/recipients may request aid or services in their primary language.

Facility Element/Finding	Corrective Action
Continued from previous page	Continued from previous page
3rd Floor (CFS): CFS hours of operation not in threshold languages.	(Div. 21-107.212)
Directional & Informational Signage Available in threshold languages? 3rd Floor (CFS): "Ring the Bell" sign not in threshold languages.	All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants/recipients may request aid or services in their primary language. (Div. 21-107.212)

- a. Corrective Actions: Refer to Corrective Action column above (Section A, 2).
- **b.** Recommendations: Address and submit a Corrective Action Plan and correct all items identified in the Corrective Action column above (Section A, 2).
- 3. Facility Location: (4651 Telephone Road, Ventura, CA)

Facility Element/Finding	Corrective Action
Disabled Parking Is there unauthorized parking signage at entrance to off-street accessible parking?	An additional sign shall be posted either in a conspicuous place at each entrance to an off-street parking facility OR immediately adjacent to on-site accessible parking and visible from each parking space. (CA T24 11B-502.8), CARM page159
3 Signs at entry of parking lot missing tow company with correct language is needed.	The additional sign shall not be less than 17 inches wide by 22 inches high. (CA T24 11B502.8.1), CARM Figure 4, page 159 The additional sign shall clearly state in letters with a minimum height of 1 inch the following: Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or special license

Facility Element/Finding	Corrective Action
Continued from previous page	Continued from previous page plates issued for persons with disabilities will be towed away at the owner's expense. Towed vehicles may be reclaimed at: or by telephoning (CA T24 11B-502.8.2), CARM page 159 Blank spaces shall be filled in with appropriate information as a permanent part of the sign. (CA T24 11B-502.8.2), CARM page 159
Disabled Parking	Parking identification signs shall be reflectorized with a minimum area of 70 square inches.
One of three signs (located in the back of the facility) has bushes obstructing visibility.	(CA T24 11B-502.6.1), CARM page 158 Signs shall be 60 inches minimum above the finish floor or ground surface measured to the bottom of the sign. (CA T24 11B-502.6), (ADA 502.6), CARM page 158 Exceptions: Signs located within an accessible route shall be a minimum of 80 inches above the finish floor or ground surface measured to the bottom of the sign. (CA T24 11B-502.6), CARM page 158 Additional language or an additional sign below the ISA shall state Minimum Fine \$250. (CA T24 11B-502.6.2), CARM page 158
Main or Alternate Entrance Directional signage to accessible entrance if not main entrance? Height of signage?	Directional signs complying with Visual Characters heading in Section 63 (11B-703.5), Signs & Identification, including the International Symbol of Accessibility complying with International Symbol of Accessibility heading in Section 63 (11B-703.7.2.1), Signs & Identification, indicating the accessible route to

Facility Element/Finding	Corrective Action
Continued from previous page	Continued from previous page
page	the nearest accessible entrance shall be provided at junctions when the accessible route diverges from the regular circulation path.
	(CA T24 11B-216.6), CARM page 35
	Visual characters shall be 40 inches minimum above the finish floor or ground.
	(CA T24 11B-703.5.6), (ADA 703.5.6), CARM page 449
	Recommend Posting Two Directional signs, at back entry to parking lot directing disabled clients to park in front of the building.
Lobby Publication 13 available in large print (08/16), Braille (12/04), audio (05/01)? Lobby Receptionist was	Pamphlets supplied by CDSS entitled "Your Rights Under California Welfare Programs" shall be made available in all CWD waiting rooms and reception areas and shall be distributed and explained to each applicant/recipient at intake and reinvestigation of eligibility.
unable to provide a copy of the Publication 13 in Braille expeditiously.	The pamphlets shall be in the primary languages of the CWD's applicant/recipient population including alternate formats (example, cassette tapes, large print, etc.).
	(Div. 21-107.221)

- a. Corrective Actions: Refer to Corrective Action column above (Section A, 3).
- **b.** Recommendations: Address and submit a Corrective Action Plan and correct all items identified in the Corrective Action column above (Section A, 3).

4. Facility Location: (725 E. Main Street, Santa Paula, CA)

Facility Element/Finding	Corrective Action
Disabled Parking	
Parking sign at entrance to parking lot is missing tow company information and phone number.	An additional sign shall be posted either in a conspicuous place at each entrance to an off-street parking facility OR immediately adjacent to on-site accessible parking and visible from each parking space.
	(CA T24 11B-502.8), CARM page159
	The additional sign shall not be less than 17 inches wide by 22 inches high.
	(CA T24 11B502.8.1), CARM Figure 4, page 159
	The additional sign shall clearly state in letters with a minimum height of 1 inch the following: Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or special license plates issued for persons with disabilities will be towed away at the owner's expense. Towed vehicles may be reclaimed at: or by telephoning
	(CA T24 11B-502.8.2), CARM page 159
	Blank spaces shall be filled in with appropriate information as a permanent part of the sign.
	(CA T24 11B-502.8.2), CARM page 159
Disabled Parking Is there unauthorized parking signage at entrance to off-street accessible parking?	An additional sign shall be posted either in a conspicuous place at each entrance to an off-street parking facility OR immediately adjacent to on-site accessible parking and visible from each parking space. (CA T24 11B-502.8), CARM page 159
Parking sign at rear entrance to parking lot is unreadable.	The additional sign shall not be less than 17 inches wide by 22 inches high.
	(CA T24 11B502.8.1), CARM Figure 4, page 159

Facility Element/Finding	Corrective Action
Continued from previous page	Continued from previous page The additional sign shall clearly state in letters with a minimum height of 1 inch the following: Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or special license plates issued for persons with disabilities will be towed away at the owner's expense. Towed vehicles may be reclaimed at: or by telephoning (CA T24 11B-502.8.2), CARM page 159 Blank spaces shall be filled in with appropriate information as a permanent part of the sign. (CA T24 11B-502.8.2), CARM page 159
Disabled Parking	The Parking access aisles shall adjoin an accessible
Disabled Parking Location of access aisle? "No Parking" painted on pavement in access aisles (letters minimum 12 inches high)? Loading and unloading access aisle? Disabled parking aisle to sidewalk next to building is missing appropriate parking signage.	The Parking access aisles shall adjoin an accessible route. (CA T24 11B-502.3), (ADA 502.3), CARM page 167 The words NO PARKING shall be painted on the surface of each access aisle. (CA T24 11B-502.3.3), CARM page 166 This notice shall be painted in white letters a minimum of 12 inches in height and located to be visible from the adjacent vehicular way. (CA 11B-502.3.3), CARM page 166 Access aisles shall be marked with a blue painted borderline around their perimeter. (CA T24 11B-502.3.3), (ADA 502.3.3), CARM page 164

Facility Element/Finding	Corrective Action
Continued from previous page	Continued from previous page The area within the blue borderlines shall be marked with hatched lines a maximum of 36 inches on center in a color contrasting with that of the aisle surface, preferably blue or white. (CA T24 11B-502.3.3), CARM page 164 Recommendation to paint disabled parking aisle to sidewalk next to building with appropriate signage.
Disabled Parking Signage on pavement clearly depicts a	The parking space shall be marked with an ISA in white on a blue background - a minimum 36 inches wide by 36 inches high.
wheelchair with occupant?	(CA T24 11B-502.6.4.1), CARM page 159
Disabled parking lines need	
to be repainted.	OR
	In white or a suitable contrasting color.
	(CA T24 11B-502.6.4.2), CARM page 159
	The centerline of the ISA shall be a maximum of 6 inches from the centerline of the parking space, its sides parallel to the length of the parking space and its lower corner at, or lower side aligned with, the end of the parking space length.
	(CA T24 11B-502.6.4.2), CARM page 159
	Repaint disabled parking lines.
Unisex Restroom Pipes under sink securely insulated?	Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact.
Unisex Restroom:	(CA T24 11B-606.5), (ADA 606.5), CARM page 372
water basin pipes are not insulated correctly.	There shall be no sharp or abrasive surfaces under lavatories and sinks.
	(CA T24 11B-606.5), (ADA 606.5), CARM page 37

Facility Element/Finding	Corrective Action
Women's Restroom Pipes under sink securely insulated?	Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact.
Women's water basin pipes are not insulated correctly.	(CA T24 11B-606.5), (ADA 606.5), CARM page 372 There shall be no sharp or abrasive surfaces under lavatories and sinks. (CA T24 11B-606.5), (ADA 606.5), CARM page 37
Women's Restroom Is there proper signage on the wall for permanent identification? Women's Restroom missing wall sign at entry.	Where there is no wall space at the latch side of a single door or at the right side of double doors, signs shall be located on the nearest adjacent wall. (CA T24 11B-703.4.2), (ADA 703.4.2), CARM page 447
Women's Restroom Adequate turning space? Women's Restroom stall does not have min 60 inches wide and 48 inches deep turning space in front of toilet.	Clearance around a water closet shall be 60 inches minimum measured perpendicular from the side wall and 56 inches minimum measured perpendicular from the rear wall. (CA T24 11B-604.3.1), (ADA 604.3.1), CARM page 401 A minimum 60 inches wide and 48 inches deep maneuvering space shall be provided in front of the water closet. (CA T24 11B-604.3.1), (ADA 604.3.1), CARM page 401

- a. Corrective Actions: Refer to Corrective Action column above (Section A, 4).
- **b.** Recommendations: Address and submit a Corrective Action Plan and correct all items identified in the Corrective Action column above (Section A, 4).

V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES

Counties are required by Division 21 to ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English-speaking population and individuals with disabilities without undue delays. Counties are required to collect data on primary language and ethnic origin of applicants/recipients (identification of primary language must be done by the applicant/recipient).

Using this information, a County may determine 1) the number of public contact staff necessary to provide bilingual services, 2) the manner in which it can best provide interpreter services without bilingual staff and 3) the language needs of individual applicants/recipients. Counties must employ an appropriate number of certified bilingual public contact employees in each program and/or location that serves a substantial number of non-English-speaking persons. In offices where bilingual staff are not required because non-English-speaking persons do not represent a substantial number, counties must provide effective bilingual services through interpreter or other means.

Counties must also provide auxiliary aids and services, including Braille material, taped text, qualified interpreters, large print materials, telecommunication devices for the deaf (TDDs), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, counties must ensure that written materials be available in individuals' primary languages if the forms and materials are provided by CDSS in that language, and that information inserted in notices of action (NOA) be in the individuals' primary language.

A. Findings from Program Manager Surveys, Staff Interviews, and Case File Reviews

Question: (Please answer yes/no and provide response with comments)	Comments
Does the County identify a client's language need upon first contact? How?	Yes, the County identifies the client's language requirements on first contact by asking the client about language preference during the first interview.
Does the County use a primary language form?	Yes, a primary language form is used.
Does the client self-declare on this form?	Yes, clients are able to self-declare.
Are non-English- or limited- English- speaking clients provided bilingual services?	Yes, non-English- or limited- English- speaking clients are provided bilingual services.

Question: (Please answer yes/no and provide response with comments)	Comments
After it has been determined that the client is limited-English or non-English speaking, is there a County process for procuring an interpreter?	Yes, the County utilizes interpretive services when needed.
Does the County have a contracted language line provider, a county interpreter list, or any other interpreter process?	Yes, the County has a contracted language line provider and a County interpreter list.
Is there a delay in providing interpretive services?	No, there is no delay. Interpretive services are provided quickly and efficiently in a reasonable amount of time.
Are County interpreters certified?	Yes, County interpreters are certified.
Does the County have adequate interpreter services?	Yes, the County has adequate interpreter services.
Does the County allow minors to be interpreters? If so, under what circumstances?	No, the County does not allow minors under the age of 18 to be interpreters.
Does the County allow the client to provide his or her own interpreter?	Yes, a client can bring their own interpreter, but they are advised about possible misinformation of services.
Does the County ensure that the client- provided interpreter understands what is being interpreted for the client?	Yes, a client can bring their own interpreter, and County staff advises clients about possible misinformation about services. The County does not undertake any other action to ensure interpreter understanding.
If there is not a Release of Confidentiality Information form, how and where is the client-provided interpreter documented?	Yes, at interview time a Release of Confidentiality Information form is given to the client and explained verbally to the client(s).
Does the County use the CDSS-translated forms in the clients' primary languages?	Yes, the County is aware and does use the CDSS-translated forms in the clients' primary languages. They are aware of where to find them.

Question: (Please answer yes/no and	Comments
provide response with comments)	Comments
Is the information that is to be inserted into NOA translated into the client's primary language?	Yes, information inserted into the NOA is translated into the client's primary language and inserted into documents. The County sends out NOA's in the client's primary language also.
If language to be inserted into NOA is not available, is there a procedure to ensure information translated to client's primary language?	Yes, when there is no available translated language, staff will work to have the information translated by a qualified translator and incorporate the translated language into the provided documents. The information on the form is also explained to the client.
Does the County provide auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Publication 13)?	Yes, the County is aware of auxiliary services and receptionists at all offices are aware of where to obtain these services to assist persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, and/or large print materials.
Does the County identify a client with a disability (physical, mental, or learning)?	Yes, at intake the County utilizes an intake form that assists in identifying a client's physical, mental, or learning needs.
Does the County assist clients with self-identifying a disability?	Yes, at intake staff asks the client if there are any reasonable accommodations the client may need.
Does the County have a policy and procedure in place for assisting clients with a disability (physical, mental, or learning)?	Yes, the County has a policy for assisting clients with a disability (physical, mental, or learning).
Does the County offer reasonable accommodations to clients with a disability (physical, mental, or learning)?	Yes, at intake staff asks the client if there are any reasonable accommodations the client may need.
Does the County identify and assist the client who has learning disabilities or a client who cannot read or write?	Yes, when a client has difficulty understanding or completing documents, staff explains documents verbally and the assists the client complete the paperwork.

Question: (Please answer yes/no and provide response with comments)	Comments
Does the County offer a screening for learning disabilities?	Yes, the County has screening for learning disabilities.
Is there an established process for offering a screening?	Yes, the County has an established process for offering screening.
Is the client identified as having a learning disability referred for an evaluation?	Yes, clients identified as having a learning disability are referred for an evaluation.

B. Corrective Actions: None.

C. Recommendations: None.

VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

Counties are required to ensure that case records document applicant's/recipient's ethnic origin and primary language, the method used to provide bilingual services, information that identifies an applicant/recipient as disabled, and an applicant's/recipient's request for auxiliary aids and services.

A. Findings from Case File Reviews and Staff Interviews

CalFresh

Item	How item is Documented
Ethnic Origin	Identified at client intake. Documented in case file.
Method of identifying client's primary language	Identified at client intake. Documented in case file.
Method of documenting client's primary language	Identified at client intake. Documented in case file.
Method of providing bilingual services and documentation	Identified at client intake. The client will be assigned to a bilingual worker and this is documented in the case file.
Client provided own interpreter	When a client brings their own interpreter it is documented in the case file.

Item	How item is Documented
Method to inform client of potential problem using own interpreter	The client is advised verbally of potential problems using their own interpreter and the conversation is documented in the case file.
Release of information to interpreter	The client is given the release of information form and the form is explained to the client. This is documented in the case file.
Individuals acceptance or refusal of written material offered in primary language	When a client accepts or refuses written material in their language it is documented in their case file.
Documentation of minor used as interpreter	A minor under 18 is not used as an interpreter but when the client insists, it is documented in the case file.
Documentation of circumstance for using minor interpreter temporarily	A minor under 18 is not used as an interpreter but when the client insists, the circumstance for using a minor is documented in the case file.
Method of identifying client's disability	The client self identifies any disabilities by using a reasonable accommodation form and is documented in the case file. The client is personally assisted by the worker, if needed, to complete the form.
Method of documenting client's disability (physical, mental, or learning)	When the client self identifies any disability, it is documented in the case file.
Method of offering a reasonable accommodation to the client with a disability	When a client is offered a reasonable accommodation, it is documented in the case file.
Method of documenting client's reasonable accommodation	When the client self identifies any disability, it is documented in the case file and at every client interview the reasonable accommodation is acknowledged.

CalWORKs & Employment Services

Item	How item is Documented
Ethnic Origin	Identified at client intake. Documented in case file.
Method of identifying client's primary language	Identified at client intake. Documented in case file.
Method of documenting client's primary language	Identified at client intake. Documented in case file.
Method of providing bilingual services and documentation	Identified at client intake. The client will be assigned to a bilingual worker and this is documented in the case file.
Client provided own interpreter	When a client brings their own interpreter it is documented in the case file.
Method to inform client of potential problem using own interpreter	The client is advised verbally of potential problems using their own interpreter and the conversation is documented in the case file.
Release of information to interpreter	The client is given the release of information form and the form is explained to the client. This is documented in the case file.
Individuals acceptance or refusal of written material offered in primary language	When a client accepts or refuses written material in their language it is documented in their case file.
Documentation of minor used as interpreter	A minor under 18 is not used as an interpreter but when the client insists, it is documented in the case file.
Documentation of circumstance for using minor interpreter temporarily	A minor under 18 is not used as an interpreter but when the client insists, the circumstance for using a

Item	How item is Documented
Continued from previous page	Continued from previous page minor is documented in the case file.
Method of identifying client's disability	The client self identifies any disabilities by using a reasonable accommodation form and is documented in the case file. The client is personally assisted by the worker, if needed, to complete the form.
Method of documenting client's disability (physical, mental, or learning)	When the client self identifies any disability, it is documented in the case file.
Method of offering a reasonable accommodation to the client with a disability	When a client is offered a reasonable accommodation, it is documented in the case file.
Method of documenting client's reasonable accommodation	When the client self identifies any disability, it is documented in the case file and at every client interview the reasonable accommodation is acknowledged.

IHSS

Item	How item is Documented
Ethnic Origin	Identified at client intake. Documented in case file.
Method of identifying client's primary language	Identified at client intake. Documented in case file.
Method of documenting client's primary language	Identified at client intake. Documented in case file.
Method of providing bilingual services and documentation	Identified at client intake. The client will be assigned to a bilingual worker and documented in the case file.

Item	How item is Documented
Client provided own interpreter	When a client brings their own interpreter it is documented in the case file.
Method to inform client of potential problem using own interpreter	The client is advised verbally of potential problems using their own interpreter and the conversation is documented in the case file.
Release of information to interpreter	The client is given the release of information form and is explained to the client. This is documented in the case file.
Individuals acceptance or refusal of written material offered in primary language	When a client accepts or refuses written material in their language it is documented in their case file.
Documentation of minor used as interpreter	A minor under 18 is not used as an interpreter but when the client insists, it is documented in the case file.
Documentation of circumstance for using minor interpreter temporarily	A minor under 18 is not used as an interpreter but when the client insists, the circumstance for using a minor is documented in the case file.
Method of identifying client's disability	The client self identifies any disabilities by using a reasonable accommodation form and is documented in the case file. The client is personally assisted by the worker, if needed, to complete the form.
Method of documenting client's disability (physical, mental, or learning)	When the client self identifies any disability, it is documented in the case file.
Method of offering a reasonable accommodation to the client with a disability	When a client is offered a reasonable accommodation, it is documented in the case file.

Item	How item is Documented
Method of documenting client's reasonable accommodation	When the client self identifies any disability, it is documented in the case file and at every client interview the reasonable accommodation is acknowledged.

Children's Services

Item	How item is Documented
Ethnic Origin	Identified at client intake. Documented in case file.
Method of identifying client's primary language	Identified at client intake. Documented in case file.
Method of documenting client's primary language	Identified at client intake. Documented in case file.
Method of providing bilingual services and documentation	Identified at client intake. The client will be assigned to a bilingual worker and documented in the case file.
Client provided own interpreter	When a client brings their own interpreter it is documented in the case file.
Method to inform client of potential problem using own interpreter	The client is advised verbally of potential problems using their own interpreter and the conversation is documented in the case file.
Release of information to interpreter	The client is given the release of information form and the form is explained to the client. This is documented in the case file.
Individuals acceptance or refusal of written material offered in primary language	When a client accepts or refuses written material in their language it is documented in their case file.
Documentation of minor used as interpreter	A minor under 18 is not used as an interpreter but when the client insists, it is documented in the case file.

Item	How item is Documented
Documentation of circumstance for using minor interpreter temporarily	A minor under 18 is not used as an interpreter but when the client insists, the circumstance for using a minor is documented in the case file.
Method of identifying client's disability	The client self identifies any disabilities by using a reasonable accommodation form and is documented in the case file. The client is personally assisted by the worker, if needed, to complete the form.
Method of documenting client's disability (physical, mental, or learning)	When the client self identifies any disability, it is documented in the case file.
Method of offering a reasonable accommodation to the client with a disability	When a client is offered a reasonable accommodation, it is documented in the case file.
Method of documenting client's reasonable accommodation	When the client self identifies any disability, it is documented in the case file and at every client interview the reasonable accommodation is acknowledged.

B. Corrective Actions: None.

C. Recommendations: None.

VII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights, cultural awareness, Section 504 of the Rehabilitation Act of 1973 (Section 504), and ADA training for all public contact employees, including familiarization with the discrimination complaint process and all other requirements of Division 21. The training should be included in orientation, as well as the continuing training programs.

A. Findings

Interview Questions: (Please answer yes/no and provide response with comments)	Comments
Are employees trained in the requirement of Section 504 and ADA?	Yes, employees are trained on Section 504 and ADA requirements.
Do employees receive continued Division 21 Training?	Yes, Division 21 Training is accomplished annually.
Do employees understand the County policy regarding a client's rights and procedure to follow when receiving a discrimination complaint?	Yes, employees understand the County policy regarding a client's rights and procedure to follow when receiving a discrimination complaint.
Does the County provide employees Cultural Awareness Training?	Yes, employees receive Cultural Awareness Training during the annual training.
Do the CSW's have an understanding of Multi-Ethnic Placement Act (MEPA)?	Yes, during the annual training employees receive Multi-Ethnic Placement Act (MEPA) training.
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	Yes, in Ventura County the employees seem knowledgeable about the predominant cultural groups receiving services in their area.
Does the County provide training on how to identify clients with disabilities (physical, mental & learning)?	Yes, training on how to identify clients with disabilities (physical, mental & learning) is completed during the annual training.
Do employees receive training on reasonable accommodation for clients with disabilities?	Yes, training on how employees understand the County policy regarding clients with disabilities is completed during the annual training.
Do the employees understand the County policy regarding a client's right to a reasonable accommodation?	Yes, training on how employees understand the County policy regarding a client's right to a reasonable accommodation is accomplished during the annual training.

B. Corrective Actions: None.

C. Recommendations: None.

VIII. DISCRIMINATION COMPLAINT PROCEDURES

Counties are required to maintain a process for addressing all complaints of discrimination. They must track complaints of discrimination through the use of a control log in which all relevant information is kept, including when the complaint was received, the name of the complainant, identifying numbers and programs, basis of discrimination, and resolution. It is usually the Civil Rights Coordinator's responsibility to maintain this log.

A. Findings from Staff Interviews, Civil Rights Coordinator, and Program Manager Surveys

Interview and Review Areas: (Please answer yes/no and provide response with comments)	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?	Yes, utilizing the worker questionnaire it was summarized that employees can easily identify the difference between a program, discrimination, and a personnel complaint.
Do the employees know who the Civil Rights Coordinator is?	Yes, everyone asked in the County review, was able to identify the Civil Rights Coordinator.
Do the employees know the location of the Civil Rights poster "Everyone is Equal (PUB 86)" with information as to how and where the clients can file a discrimination complaint?	Yes, employees asked the location of the Civil Rights poster "Everyone is Equal (PUB 86)" with information as to how and where the clients can file a discrimination complaint all knew where to find it.
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	Yes, the Civil Rights Coordinator keeps the complaint log complete and up to date.

B. Corrective Actions: None.

C. Recommendations: None.

IX. VENDOR CONTRACTS

Counties are required to ensure contracted services with contractors, vendors, consultants, and other providers of service, who receive state or federal assistance, include the assurance of compliance agreement.

A. Contracts Review

Number of Contracts Reviewed	10
Number of Contracts with an Assurance of Compliance Agreement	10

B. Corrective Actions: None.

C. Recommendations: None.

X. CALL CENTER EVALUATION

County Call/Service Centers are evaluated to ensure services provided are nondiscriminatory toward non-English speaking clients and clients with a disability (physical, mental, or learning).

A. Findings from Call/Service Center site visit and interviews

Question: (Please answer yes/no and provide response with comments)	Comments
Does the County have a Call Center/Service Center?	A Call Center is not being used in this County. The County is able to service all clients in regular offices.

B. Corrective Actions: None.

C. Recommendations: None.

XI. COMMUNITY INPUT

As a part of this review, and as noted in Section II, feedback was sought from community and advocate groups.

A. Major Observations

Arrow Child and Family Ministries – Arrow Child and Family Ministries was contacted by telephone and had no input on services they felt needed to be addressed with the County.

Casa Pacifica – No observations were obtained. Casa Pacifica was contacted by telephone and had no input on services they felt needed to be addressed with the County.

XII. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

The Ventura County Human Services Agency Civil Rights Compliance Plan for the period April 27, 2018 to April 26, 2019, was received on April 25, 2018. It is approved as submitted.

XIII. CONCLUSION

The CDSS Reviewer found the County of Ventura Human Services Agency staff warm, welcoming, informative and very supportive. Particular thanks to Don Aguirre, Civil Rights Coordinator, for organizing the details of the review, and to all County Staff who assisted in each of the facility reviews. In each District Office, staff were very helpful with the facility reviews, case reviews, and computer assistance.

The CDSS found the County of Ventura Human Services Agency in satisfactory compliance with CDSS Division 21 Regulations, and other applicable state and federal laws. County staff continues to reflect a commitment similar to that expressed by management with respect to ensuring access, assistance, and compliance.

The County of Ventura Human Services Agency must remedy the deficiencies identified in this report by taking corrective actions. A CAP must be received by CDSS within 60 days of the date of the cover letter to this report; and the plan must include a schedule of all actions that will be taken to correct the deficiencies, and an indication of who will be responsible for implementing the corrective action.

It is CDSS' intent that this report be used to create a positive interaction between the County and CDSS to identify and correct compliance violations and to provide the County with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. Civil Rights Unit staff is available to provide technical assistance as requested.